

# **EXHIBIT B**

**From:** Prouty, Erika Dackin <eprouty@bakerlaw.com>  
**Sent:** Tuesday, March 11, 2025 2:41 PM  
**To:** Theodore, Elisabeth; Eddie Speas; zzz.External.CMackie@poynerspruill.com; Freedman, John A.; Jones, Stanton; Steed, Terence; de Nevers, Orion  
**Cc:** Phil Strach; Jordan Koonts; McKnight, Katherine L.; Lewis, Patrick T.; Cassie Holt; Alyssa Riggins; Stanley, Trevor M.; Raile, Richard  
**Subject:** RE: Pierce v. North Carolina State Board of Elections - Legislative Defendants' Supplemental Rebuttal RPV Report  
**Attachments:** Pierce v. NCSBE - Errata of Dr. John Alford to Supplemental Rebuttal Report.pdf

External E-mail

Elisabeth,

Please see the attached errata to Dr. Alford's March 7, 2025 Supplemental Rebuttal Report.

Sincerely,

**Erika Prouty**  
Associate

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**BakerHostetler**

200 Civic Center Drive | Suite 1200  
Columbus, OH 43215-4138  
T +1.614.462.4710

eprouty@bakerlaw.com  
bakerlaw.com



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**From:** Prouty, Erika Dackin  
**Sent:** Tuesday, March 11, 2025 11:56 AM  
**To:** Theodore, Elisabeth <Elisabeth.Theodore@arnoldporter.com>; Eddie Speas <ESpeas@poynerspruill.com>; CMackie@poynerspruill.com; Freedman, John A. <John.Freedman@arnoldporter.com>; Jones, Stanton <Stanton.Jones@arnoldporter.com>; Steed, Terence <Tsteed@ncdoj.gov>; de Nevers, Orion <Orion.deNevers@arnoldporter.com>  
**Cc:** Phil Strach <phil.strach@nelsonmullins.com>; Jordan Koonts <jordan.koonts@nelsonmullins.com>; McKnight, Katherine L. <kmcknight@bakerlaw.com>; Lewis, Patrick T. <plewis@bakerlaw.com>; Cassie Holt <cassie.holt@nelsonmullins.com>; Alyssa Riggins <alyssa.riggins@nelsonmullins.com>; Stanley, Trevor M. <tstanley@bakerlaw.com>; Raile, Richard <rraile@bakerlaw.com>  
**Subject:** RE: Pierce v. North Carolina State Board of Elections - Legislative Defendants' Supplemental Rebuttal RPV Report

Elisabeth,

Thank you for bringing this issue to our attention. We are working with Dr. Alford to prepare an errata and will be able to send it to you this afternoon.

Sincerely,

**Erika Prouty**  
Associate

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**BakerHostetler**

200 Civic Center Drive | Suite 1200  
Columbus, OH 43215-4138  
T +1.614.462.4710

eprouty@bakerlaw.com  
bakerlaw.com



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**From:** Theodore, Elisabeth <[Elisabeth.Theodore@arnoldporter.com](mailto:Elisabeth.Theodore@arnoldporter.com)>  
**Sent:** Tuesday, March 11, 2025 10:29 AM  
**To:** Prouty, Erika Dackin <[eprouty@bakerlaw.com](mailto:eprouty@bakerlaw.com)>; Eddie Speas <[ESpeas@poynerspruill.com](mailto:ESpeas@poynerspruill.com)>; CMackie@poynerspruill.com; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Jones, Stanton <[Stanton.Jones@arnoldporter.com](mailto:Stanton.Jones@arnoldporter.com)>; Steed, Terence <[Tsteed@ncdoj.gov](mailto:Tsteed@ncdoj.gov)>; de Nevers, Orion <[Orion.deNevers@arnoldporter.com](mailto:Orion.deNevers@arnoldporter.com)>  
**Cc:** Phil Strach <[phil.strach@nelsonmullins.com](mailto:phil.strach@nelsonmullins.com)>; Jordan Koonts <[jordan.koonts@nelsonmullins.com](mailto:jordan.koonts@nelsonmullins.com)>; McKnight, Katherine L. <[kmcknight@bakerlaw.com](mailto:kmcknight@bakerlaw.com)>; Lewis, Patrick T. <[plewis@bakerlaw.com](mailto:plewis@bakerlaw.com)>; Cassie Holt <[cassie.holt@nelsonmullins.com](mailto:cassie.holt@nelsonmullins.com)>; Alyssa Riggins <[alyssa.riggins@nelsonmullins.com](mailto:alyssa.riggins@nelsonmullins.com)>; Stanley, Trevor M. <[tstanley@bakerlaw.com](mailto:tstanley@bakerlaw.com)>; Raile, Richard <[rraile@bakerlaw.com](mailto:rraile@bakerlaw.com)>  
**Subject:** RE: Pierce v. North Carolina State Board of Elections - Legislative Defendants' Supplemental Rebuttal RPV Report

[External Email: Use caution when clicking on links or opening attachments.]

Erika:

We wanted to follow up on this request, since the source for this data should have been disclosed on Friday. Can you please send us the link?

Thanks,  
Elisabeth

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**From:** Theodore, Elisabeth  
**Sent:** Monday, March 10, 2025 3:47 PM  
**To:** Prouty, Erika Dackin <[eprouty@bakerlaw.com](mailto:eprouty@bakerlaw.com)>; Eddie Speas <[ESpeas@poynerspruill.com](mailto:ESpeas@poynerspruill.com)>; zzz.External.CMackie@poynerspruill.com <[CMackie@poynerspruill.com](mailto:CMackie@poynerspruill.com)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Jones, Stanton <[Stanton.Jones@arnoldporter.com](mailto:Stanton.Jones@arnoldporter.com)>; Steed, Terence <[Tsteed@ncdoj.gov](mailto:Tsteed@ncdoj.gov)>; de Nevers, Orion <[Orion.deNevers@arnoldporter.com](mailto:Orion.deNevers@arnoldporter.com)>  
**Cc:** Phil Strach <[phil.strach@nelsonmullins.com](mailto:phil.strach@nelsonmullins.com)>; Jordan Koonts <[jordan.koonts@nelsonmullins.com](mailto:jordan.koonts@nelsonmullins.com)>; McKnight, Katherine L. <[kmcknight@bakerlaw.com](mailto:kmcknight@bakerlaw.com)>; Lewis, Patrick T. <[plewis@bakerlaw.com](mailto:plewis@bakerlaw.com)>; Cassie Holt <[cassie.holt@nelsonmullins.com](mailto:cassie.holt@nelsonmullins.com)>; Alyssa Riggins <[alyssa.riggins@nelsonmullins.com](mailto:alyssa.riggins@nelsonmullins.com)>; Stanley, Trevor M. <[tstanley@bakerlaw.com](mailto:tstanley@bakerlaw.com)>; Raile, Richard <[rraile@bakerlaw.com](mailto:rraile@bakerlaw.com)>

**Subject:** RE: Pierce v. North Carolina State Board of Elections - Legislative Defendants' Supplemental Rebuttal RPV Report

Erika:

Can you please provide a link to the New York Times exit poll data that Dr. Alford indicates he is relying on on page 3 of his supplemental rebuttal report? There is no citation/hyperlink in the report and we did not see this data in the backup data.

Thanks,  
Elisabeth

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**From:** Prouty, Erika Dackin <[eprouty@bakerlaw.com](mailto:eprouty@bakerlaw.com)>

**Sent:** Friday, March 7, 2025 9:31 PM

**To:** Eddie Speas <[ESpeas@poynerspruill.com](mailto:ESpeas@poynerspruill.com)>; zzz.External.CMackie@poynerspruill.com <[CMackie@poynerspruill.com](mailto:CMackie@poynerspruill.com)>; Freedman, John A. <[John.Freedman@arnoldporter.com](mailto:John.Freedman@arnoldporter.com)>; Jones, Stanton <[Stanton.Jones@arnoldporter.com](mailto:Stanton.Jones@arnoldporter.com)>; Theodore, Elisabeth <[Elisabeth.Theodore@arnoldporter.com](mailto:Elisabeth.Theodore@arnoldporter.com)>; Steed, Terence <[Tsteed@ncdoj.gov](mailto:Tsteed@ncdoj.gov)>; de Nevers, Orion <[Orion.deNevers@arnoldporter.com](mailto:Orion.deNevers@arnoldporter.com)>

**Cc:** Phil Strach <[phil.strach@nelsonmullins.com](mailto:phil.strach@nelsonmullins.com)>; Jordan Koonts <[jordan.koonts@nelsonmullins.com](mailto:jordan.koonts@nelsonmullins.com)>; McKnight, Katherine L. <[kmcknight@bakerlaw.com](mailto:kmcknight@bakerlaw.com)>; Lewis, Patrick T. <[plewis@bakerlaw.com](mailto:plewis@bakerlaw.com)>; Cassie Holt <[cassie.holt@nelsonmullins.com](mailto:cassie.holt@nelsonmullins.com)>; Alyssa Riggins <[alyssa.riggins@nelsonmullins.com](mailto:alyssa.riggins@nelsonmullins.com)>; Stanley, Trevor M. <[tstanley@bakerlaw.com](mailto:tstanley@bakerlaw.com)>; Raile, Richard <[rraile@bakerlaw.com](mailto:rraile@bakerlaw.com)>

**Subject:** Pierce v. North Carolina State Board of Elections - Legislative Defendants' Supplemental Rebuttal RPV Report

External E-mail

Counsel,

Please see the attached Supplemental Rebuttal Expert Report of Dr. John Alford. The report and associated back-up materials are located at the link below:

<https://globalftp.bakerlaw.com/w/f-0accb6db-71e8-469a-a2bd-14f713182097>

Please let us know if you have any trouble accessing.

Sincerely,

**Erika Prouty**  
Associate

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**BakerHostetler**  
200 Civic Center Drive | Suite 1200  
Columbus, OH 43215-4138  
T +1.614.462.4710

eprouty@bakerlaw.com  
bakerlaw.com



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